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ABSTRACT

This report considers how local Title I administrators allocate time responsibilities, how burdensome and important they find the various Title I requirements, and what effects they expect the Education Consolidation and Improvement Act to have on paperwork and administrative burden. Data include mail questionnaires returned by a national sample of 1,769 Title I directors and interviews of Title I directors in 100 districts. Among the findings are that over 50 percent of the directors spend up to 25 percent of their time administering the Title I program. Of time spent administering Title I, 26 percent is typically devoted to supervising the instructional program, 25 percent to writing applications and reports, 13 percent to budget management, 12 percent to evaluation, 10 percent to parent involvement, and 14 percent to activities including hiring, training, and dealing with officials. Time spent administering Title I varies considerably by district size. Directors ranked evaluation and student selection as the most necessary and most burdensome requirements, and comparability and parent involvement as least necessary and most burdensome. A brief bibliography is included, and relevant pages of the questionnaire are appended. (Author/MJL)

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PAPERWORK AND ADMINISTRATIVE BURDEN FOR SCHOOL DISTRICTS UNDER TITLE I

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U.S. DEPARTMENT OF EDUCATION
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A SPECIAL REPORT
FROM THE
TITLE I DISTRICT PRACTICES STUDY

PAPERWORK AND ADMINISTRATIVE BURDEN FOR SCHOOL DISTRICTS UNDER TITLE I

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Submitted To The
Planning and Evaluation Service
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PREFACE

The Title I District Practices Study was conducted by Advanced Technology, Inc. for the U.S. Department of Education's Planning and Evaluation Service. One goal of this study was to describe how local districts operated projects funded by Title I of the Elementary and Secondary Education Act [ESEA] in the 1981-82 school year. A second, related goal was to document local educators' rationales for their program decisions, their perception of the problems and benefits of requirements contained in the 1978 Title I Amendments, and their assessments of the expected effects of Chapter 1 of the Education Consolidation and Improvement Act [ECIA] on school district operations of Title I projects. The study was designed specifically to draw cross-time comparisons with the findings of the Compensatory Education Study conducted by the National Institute of Education [NIE] and to provide baseline data for subsequent analyses of Chapter 1, ECIA's administration.

The results of the Title I District Practices Study are presented in this and eight other special reports (see back cover), plus the study's Summary Report. These reports synthesize data collected from a mail questionnaire sent to Title I Directors in more than 2,000 randomly selected school districts, structured interviews and document reviews in 100 nationally representative Title I districts, and indepth case studies in 40 specially selected Title I districts.

To meet the objectives of this major national study, a special study staff was assembled within Advanced Technology's Social Sciences Division. That staff, housed in the Division's Program Evaluation Operations Center, oversaw the study design, data collection and processing, analysis work, and report preparation. The study benefited from unusually experienced data collectors who, with Advanced Technology's senior staff and consultants, conducted the structured interviews and case studies. Two consultants, Brenda Turnbull of Policy Research Associates and Joan Michie, assisted in major aspects of the study including authoring special reports and chapters in the Summary Report. Michael Gaffney and Daniel Schember of the law firm Gaffney, Anspach, Schember, Klimaski, & Marks applied their longstanding familiarity with Title I's legal and policy issues to each phase of the study.

The Project Officers for the study, Janice Anderson and Eugene Tucker, provided substantive guidance for the completion of the tasks resulting in these final reports. The suggestions of the study's Advisory Panel and helpful critiques provided by individuals from the Title I programs office, especially William Lobosco and Thomas Enderlein, are also reflected in these reports.

Members of Advanced Technology's analytic, management, and production staff who contributed to the completion of this and other reports are too numerous to list, as are the state and local officials who cooperated with this study. Without our

mentioning their names, they should know their contributions have been recognized and truly appreciated.

Ted Bartell, Project Director
Title I District Practices Study

Richard Jung, Deputy Project Director
Title I District Practices Study

PAPERWORK AND ADMINISTRATIVE BURDEN
FOR SCHOOL DISTRICTS UNDER TITLE I

SUMMARY

One of the concerns of Congress in modifying Title I of the Elementary and Secondary Education Act [ESEA] was to free school districts from unnecessary paperwork associated with the program. In the past, groups such as the Council of Chief State School Officers recommended that many of the requirements of Title I be modified to reduce paperwork and administrative burden. Despite the commonly held belief that Federal programs contain burdensome and unnecessary requirements, little empirical data exist which portray the perceptions of local Title I program administrators in the area of administrative burden.

The current discussion focuses on three related questions:

- How do local Title I administrators currently allocate their time across administrative responsibilities?
- How burdensome do Title I administrators view the various parts of the Title I requirements, how does burden relate to the importance of these activities, and what factors are associated with perceived burden?
- What do Title I administrators report will be the effects of ECIA on paperwork and administrative burden in their districts?

Data presented in this report were collected from a nationally representative sample of 1,769 Title I Directors who returned a mail questionnaire and Title I Directors in 100 school districts who were interviewed by the staff of Advanced

Technology. Results of analyses performed on data from these sources indicate that:

- Over 50 percent of the Title I Directors nationwide spend up to 25 percent of their time administering their Title I programs.
- Of the time spent administering Title I, a typical Title I Director spends 26 percent of the time supervising the instructional program, 25 percent preparing applications and reports, 13 percent managing the budget, 12 percent on evaluation, 10 percent on parent involvement, and the remaining 14 percent on items such as hiring, training, and dealing with Federal and state officials.
- Time spent administering Title I varies substantially on the size of a district. Directors in larger districts spend more on managing the budget and managing the instructional program and less time preparing applications than Directors in smaller districts.
- When asked to rank 10 requirements, Title I Directors indicate that evaluation and student selection are the most necessary and most burdensome requirements, while comparability and parent involvement are least necessary and most burdensome.
- Title I Directors agree more easily on what is necessary than on what is burdensome.
- Ratings of necessity and burden vary as a function of a district's size for the requirements of comparability, targeting, and complaint resolution.
- The burden ratings associated with evaluation are related to the time spent on evaluation by the Title I Directors; this is not true for burden ratings associated with parent involvement.
- Districts are hopeful that Chapter 1 of the Education Consolidation and Improvement Act will reduce paperwork and relax certain requirements; however, they are concerned that as the role of the state increases, state-related paperwork may also increase.

PAPERWORK AND ADMINISTRATIVE BURDEN FOR SCHOOL DISTRICTS UNDER TITLE I

INTRODUCTION

One of the preeminent concerns of Congress in modifying Title I of the Elementary and Secondary Education Act [ESEA]* was to free school district officials from unnecessary paperwork and other administrative burdens associated with this program. Chapter 1 of the Education Consolidation and Improvement Act [ECIA] of 1981 (P.L. 97-35)** states that a district's ability to meet the needs of children from low-income families

> will be more effective if education officials . . . are freed from overly prescriptive regulations and administrative burdens which are not necessary for fiscal accountability and make no contribution to the instructional program. (§552)

The burden associated with Federal program requirements in Title I has been criticized by representatives of state and local administrators. For example, the Council of Chief State School Officers [CCSSO] in testifying before Congress in 1977 identified 18 areas in which Title I requirements presented paperwork, reporting, or administrative problems. Included in their list of recommended changes were (1) requiring less detail in applications, (2) not requiring parent advisory councils [PACs] in

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*Hereafter referred to as Title I.

**Hereafter referred to as Chapter 1, or ECIA.

districts with Title I budgets of less than $50,000, and (3) limiting the number of districts which should demonstrate comparability. These complaints were raised even before the enactment of the even more detailed and prescriptive requirements of the 1978 Title I Amendments.

Studies examining the activities of local educational program administrators are rare. A recent study conducted for the Office of Education [OE] (Hannaway, 1975) used a random time-sampling methodology to examine the activities of educational administrators in medium school districts over a six-week period. When Federal program administrators in the central office were compared to other central administrators, it was found that the Federal program administrators spent more time in meetings, in clarifying rules, and in writing reports and proposals than on student issues and curricular matters.

The General Accounting Office [GAO] is concerned with the reduction of paperwork, as mandated by the Paperwork Reduction Act of 1980. A recent report (GAO, 1982) focuses on the control of paperwork within the Department of Education [ED] but does not elaborate on the details of the paperwork ED imposes or how that paperwork is perceived by states and locals. GAO's main concern is with paperwork reduction and the successful implementation of congressional and presidential directives at the agency level.

Aside from the calls for reduced Federal involvement in regulating education and the work of Hannaway just described, very little data from local school administrators are available describing administrative activities and perceptions of burden imposed by these requirements. Data from the Title I District Practices Study* provide some insights into what Title I school officials perceive to be the most administratively burdensome aspects of Title I and the likely effects of Chapter 1 on the paperwork associated with administering the program.

RESEARCH QUESTIONS

This exploratory analysis of Title I's reporting and administrative requirements on local district operations focuses on three related questions:

- How do local Title I administrators currently allocate their time across administrative responsibilities?
- How burdensome do Title I administrators view the various parts of the Title I requirements, how does burden relate to the importance of these activities, and what factors may be associated with perceived burden?
- What do Title I administrators report will be the effects of ECIA on paperwork and administrative burden in their districts?

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*Hereafter referred to as the District Practices Study or DPS. This study is limited to the Title I educationally disadvantaged and does not address the separate Title I programs for migrant, handicapped, or neglected and delinquent children.

DATA SOURCES

To address these questions, this report draws selectively upon data from the Title I District Practices Study conducted by Advanced Technology for the U.S. Department of Education. This study used the following data collection strategies to cross-validate findings:

- A mail questionnaire sent to more than 2,000 randomly selected local Title I Directors
- Structured interviews and document reviews in 100 representative Title I districts conducted in the fall of 1981
- Indepth studies in 40 specially selected Title I districts*

ADMINISTRATIVE ACTIVITIES

Title I Coordinators who received the mail questionnaire were asked to indicate what percentage of their time they spent administering Title I (see Appendix A--Question A-40). As Table 1 indicates, a majority of the 1,730 Directors (51.7 percent) responding to the question spent up to 25 percent of their time administering the program.** As one would expect, Directors in larger districts spend more time in their administration of Title I than those in smaller districts.

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*Chapter 2 of the Summary Report for Phases I and II of the District Practices Study presents the study's methodology and the rationale for this data collection approach in greater detail.

**All analysis results of data collected from our two representative samples are weighted to represent a national projection for Title I.

TABLE 1

PERCENT OF TIME TITLE I DIRECTORS SPEND ADMINISTERING TITLE I BY DISTRICT ENROLLMENT SIZE

PERCENT OF TIME ADMINISTERING TITLE I	DISTRICT ENROLLMENT: SMALL (0-2,499 students)	MEDIUM (2,500-9,999 students)	LARGE (10,000 or more students)	ROW TOTAL
0-25%	N=579 72.9%*	N=263 42.6%	N=52 14.8%	N=894 51.7%
26-75%	N=135 17.8%	N=214 34.6%	N-123 34.9%	N=472 27.3%
75-100%	N=46 6.1%	N=141 22.8%	N=151 50.3%	N=364 21.0%
COLUMN TOTAL	N=760 100.0%	N=618 100.0%	N=322 100.0%	N=1,730 100.0%

*All entries represent column percentages.

The Directors were asked how they apportion their time administering Title I across eight tasks (see Appendix A--Question A-41). For the typical (i.e., modal) Title I school district, over 50 percent of the administrative activity involves preparing Title I applications and reports (25 percent) and managing and supervising the Title I instructional program (26 percent). Managing the budget takes up 13 percent of the time, evaluation takes up 12 percent, and parent involvement takes 10 percent. The remaining 14 percent of time is spent on staff hiring and training, dealing with Federal and state officials, and other miscellaneous activities. Table 2 presents a summary of these administrative activities for districts arranged by four enrollment size categories.

An inspection of Table 2 indicates that administrative activities for Title I Directors can vary substantially based on a district's size. For example, small district Directors spend 27 percent of their time preparing Title I applications and reports compared to only 14 percent of Directors' time in 30 of the nation's 60 largest districts. These differences may be related to large districts' having more administrative personnel to help with the report preparation while smaller district Directors can only rely on themselves to complete the required reporting. Managing the budget is more time consuming in larger districts. Budget activities account for 18 percent of a Director's time in the larger districts compared with 13 percent in the smaller districts. The activity with the greatest differences in administrator's time involves managing the instructional program. On

TABLE 2

AVERAGE PERCENTAGE OF TIME SPENT ADMINISTERING ASPECTS OF TITLE I BY SIZE OF DISTRICT

ACTIVITY	SMALL (N=742)	MEDIUM (N=602)	LARGE (N=315)	AMONG 60 LARGEST (N=30)	TYPICAL DISTRICT
Preparing Title I Applications/ Reports	27%	22%	20%	14%	25%
Developing Managing Title I Budget	13%	14%	15%	18%	13%
Managing/ Supervising Instructional Program	24%	29%	31%	40%	26%
Hiring Staff, Arranging Training	6%	6%	6%	5%	6%
Organizing and Meeting with Parents	10%	10%	9%	9%	10%
Dealing with Federal/State Officials	7%	6%	8%	8%	7%
Evaluation	13%	11%	11%	7%	12%
Other	<1%	<1%	<1%	<1%	<1%

the average, small district Directors spend 24 percent of their time managing the instructional program compared to 40 percent of the time spent by the Directors of the largest districts. Not surprising, then, in the largest districts, communication about the instructional programs is more involved and assumes a greater portion of the Title I Director's time.

Given the profile of how administrators spend their time administering Title I, the next section will present data on how burdensome Title I Directors perceive various requirements.

NECESSITY AND BURDEN IN TITLE I ADMINISTRATION

In order to understand the perceptions of Title I Directors regarding burden of the legal requirements of Title I, 10 salient elements were identified. Title I Directors were asked to rank order these elements of the legal framework on a continuum of most burdensome to least burdensome. All 10 elements were also ranked on a continuum ranging from most necessary to least necessary. The following are the 10 items of the legal framework included in Question A-43 of the mail questionnaire (see Appendix A):

- Ranking and selecting project areas (i.e., procedures for selection of project areas)
- Ranking and selecting students (i.e., procedures for determining which children will be served with Title I funds)
- Parent involvement, including advisory councils (i.e., the nature and extent of parental involvement in the planning design and evaluation)

- Complaint resolution procedures (i.e., procedures for processing, responding to, and reporting problems raised by parents or other individuals)
- Evaluation procedures (i.e., use of evaluation models for assessing gains made by students in the Title I program)
- Supplement-not-supplant provisions (i.e., data to ensure that Title I funds are added to and not used to replace state and local funds)
- Maintenance of effort provisions (i.e., an assurance that funds from state and local sources did not decrease)
- Comparability procedures (i.e., documentation that level of services in every Title I school be comparable, or roughly equal, to the average level in non-Title I schools)
- Excess costs determinations (i.e., documentation that Title I services are supplemental using various program design approaches, e.g., limited pullout, pullout, inclass, and replacement)
- Adequate size, scope, and quality (i.e., an assurance that Title I services be of sufficient size, scope, and quality to give reasonable promise of success)

Rankings range from 10 to 1, with 1 representing the most necessary and most burdensome activities and 10 representing the least necessary and least burdensome activities.*

An examination of the average rankings for the necessity dimensions shows that mean ranks range from 1.7 to 7.7.** Ranked

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*To validate this ranking approach, similar questions were asked during site visits to 100 districts conducted as part of this study. Results from questions in the Title I Director Interview indicate that when the Title I Director is presented with similar questions in an open-ended format, similar rankings of burdensomeness identified by frequency of method are obtained compared to those of the mail questionnaire.

**A comparison of mean rankings to median rankings indicate no differences greater than .2, so only mean rankings are discussed.

from most necessary to least necessary, the items and their associated average rankings are:

- Rankings and student selection (1.7)
- Evaluation procedures (3.5)
- Ranking and selecting project areas (4.2)
- Adequate size, scope, and quality provisions (4.8)
- Supplement-not-supplant provisions (5.4)
- Parent involvement (5.6)
- Maintenance of effort provisions (6.5)
- Comparability procedures (7.3)
- Excess costs determinations (7.5)
- Complaint resolution procedures (7.7)

The average rankings on the burden dimension range from 3.8 to 6.5 and include, in order, from most burdensome to least burdensome:

- Parent involvement (3.8)
- Evaluation procedures (4.2)
- Comparability procedures (4.9)
- Ranking and selecting students (5.1)
- Supplement-not-supplant provisions (5.5)
- Maintenance of effort provisions (5.5)
- Ranking and selecting project areas (6.0)
- Excess costs determinations (6.0)
- Adequate size, scope, and quality provisions (6.3)
- Complaint resolution procedures (6.5)

On the burden dimension, the rankings more closely cluster around the mean and span a narrower range. Such a distribution

suggests generally less agreement about what is burdensome than what is necessary. Thus, Title I Directors agree more on the necessary elements of the program, while burdensome rankings are affected by other factors such as district size.

Separate ranking of perceived burden and necessity presents a rather segmented portrayal of Title I Directors' views about these requirements. To understand more fully how the Directors perceive these requirements, Figure 1 plots the mean rankings of the 10 items on a 2-dimensional graph. Each quadrant of the plot corresponds to one of four types of perceptions:

- Most Necessary and Most Burdensome Items
  - Evaluation
  - Student selection
- Least Necessary and Least Burdensome Items
  - Complaint resolution
  - Determinations of excess costs
  - Maintenance of effort
- Most Necessary and Least Burdensome Activities
  - Supplement-not-supplant
  - Adequate size, scope, and quality
  - Targeting
- Most Burdensome and Least Necessary Items
  - Comparability
  - Parent involvement

Comparisons by District Size

As some of the previous analyses show, administrative activities vary as a function of district characteristics such as

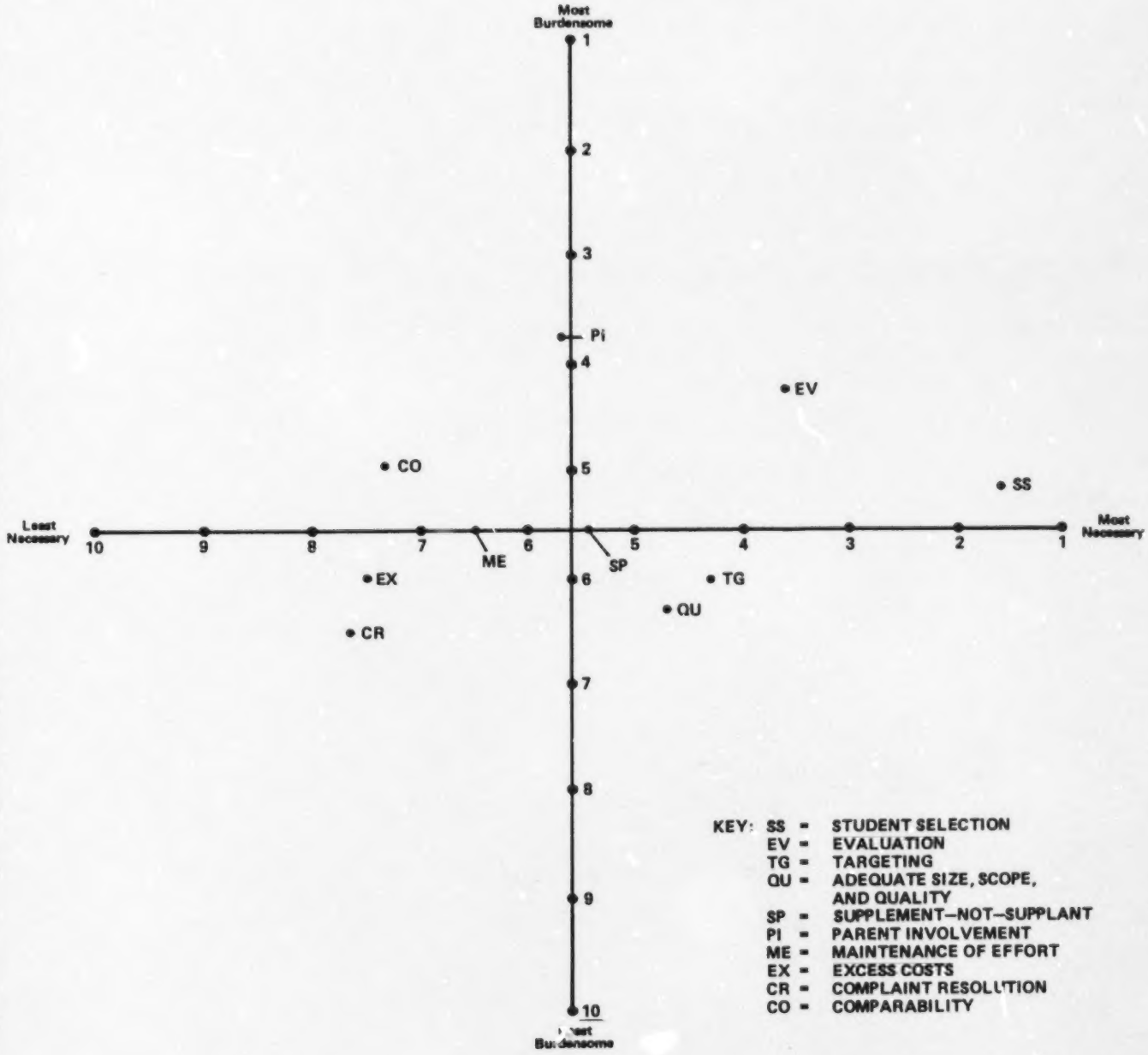

FIGURE 1

MEAN RANKINGS ON BURDEN AND NECESSITY FOR TITLE I DISTRICTS

size of enrollment. Certain legal requirements such as comparability may not be burdensome in a small district but may be extremely burdensome to larger districts having a large number of schools. Table 3 presents the mean burden and necessity rankings for small, medium, and large school districts and the range of these means across the three different size districts.* Figure 2 presents the mean rankings for small, medium, and large districts along with the means across all districts for a particular requirement. To enhance the readability of Figure 2, lines are drawn around the means of each group of ratings. Within each cluster the overall mean of each requirement (two-character designation) and the mean for small, medium, and large school districts (a one-character designations of S, M, or L) are shown. The range column in Table 3 expresses the variability of these ratings provided by Directors in these districts; this can also be seen in Figure 2.

RESULTS

The following sections focus on the results of districts' ratings of burden and necessity. The results focus primarily on requirements seen as necessary and burdensome and unnecessary and burdensome, as well as requirements that exhibit large variability between districts of differing sizes.

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*Small districts are those with total student enrollment less than 2,500 students; medium districts are defined as those with enrollments greater than or equal to 2,500 students, but less than 10,000 students. Large districts are defined as those with student enrollments of 10,000 or more.

TABLE 3

MEAN RANKINGS FOR SMALL, MEDIUM, AND LARGE DISTRICTS ON 10 ASPECTS OF TITLE I ADMINISTRATION ON NECESSITY AND BURDEN DIMENSIONS

	RANGE	SMALL	MEDIUM	LARGE
Targeting-Necessity	(1.8)	4.6	3.6	2.8
Targeting-Burden	(.8)	6.2	5.8	5.4
Student Select-Necessity	(.7)	1.6	1.8	2.3
Student Select-Burden	(.4)	5.0	5.4	5.2
Parent-Involvement Necessity	(.6)	5.4	5.9	6.0
Parent-Involvement Burden	(.6)	3.8	3.6	4.4
Complaint Resolution-Necessity	(.9)	7.5	7.9	8.4
Complaint Resolution-Burden	(.9)	6.3	6.9	7.4
Evaluation-Necessity	(.5)	3.4	3.6	3.9
Evaluation-Burden	(.6)	4.0	4.6	4.6
Supplement-not-Supplant-Necessity	(.8)	5.6	5.2	4.8
Supplement-not-Supplant-Burden	(.3)	5.4	5.7	5.5
Maintenance of Effort-Necessity	(.6)	6.3	6.7	6.9
Maintenance of Effort-Burden	(.5)	5.4	5.5	5.9
Comparability-Necessity	(.4)	7.3	7.4	7.0
Comparability-Burden	(3.1)	5.7	3.8	2.6
Excess Cost-Necessity	(.4)	7.4	7.6	7.8
Excess Cost-Burden	(.3)	6.0	6.0	6.3
Size, Scope, Quality-Necessity	(.7)	5.0	4.3	4.4
Size, Scope, Quality-Burden	(1.0)	6.0	6.7	7.0

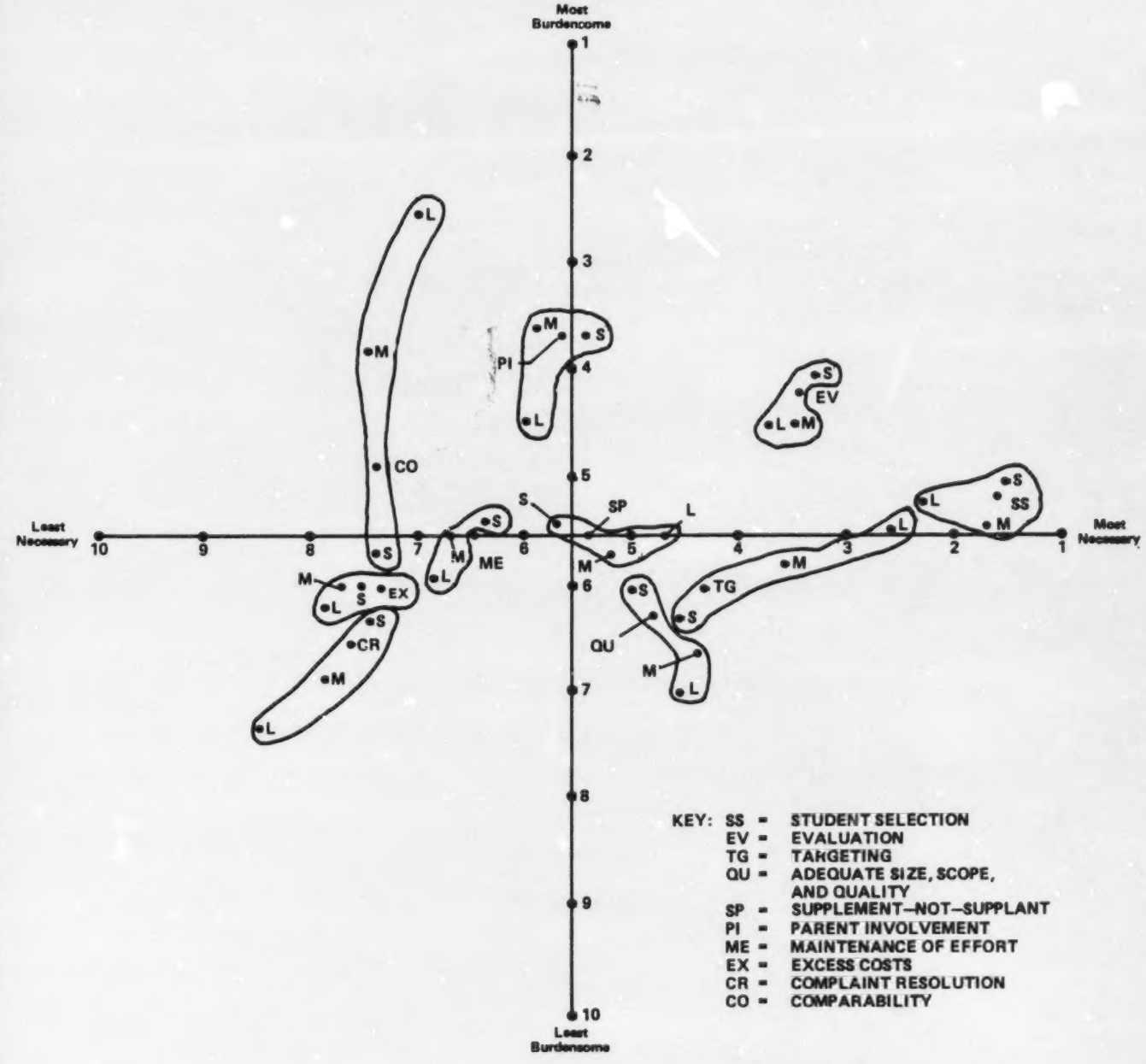

FIGURE 2

MEAN RANKINGS ON BURDEN AND NECESSITY FOR SMALL, MEDIUM, AND LARGE DISTRICTS

Comparability

The greatest variability among the requirements exists on the ratings for comparability. Most of this variability arises from differences on the burden dimension. Large districts rate comparability as the most burdensome activity (mean rating of 2.6) while medium districts and small districts rate comparability as 3.8 and 5.7, respectively. It is evident that comparability is generally not perceived as necessary across districts, and its burdensomeness is most apparent in the larger districts.

A recent study contracted by the Department of Education (Ellman, Ferrara, Moskowitz, and Stewart, 1981) shows little evidence that the existing comparability provision results in excessive administrative burden. The results of our study suggest that the reporting of comparability as being burdensome is directly related to a district's size. The average ratings for comparability tend to make the burden rating appear more neutral. However, when ratings are disaggregated by district size, significant differences are evident.

Parent Involvement

Parent involvement is regarded by all districts as excessively burdensome. These results are somewhat surprising in view of the small amount of time (10 percent) Directors spend on these activities. One can speculate that the true nature of the burden is in the difficulty of meeting an explicit or unstated standard, i.e., the requirement for a PAC of at least 8 members for each school having at least 75 children. The System Development

Corporation's [SDC] study of parental involvement finds that nearly 60 percent of schools providing Title I services to 75 or more students had 7 or fewer members on their PAC. Apparently, this requirement is difficult to meet.

Evaluation

Ratings of the evaluation requirement indicate that evaluation is seen as burdensome but necessary. There is little variability among different size districts on how evaluation is rated. This finding contracts research findings of a recent report, based primarily on case study data, that program managers view Title I evaluation requirements are both burdensome and unnecessary. In a recent survey conducted by David (1981) the evaluation requirement is characterized as "just one of the many hoops to go through in order to receive . . . [Federal] funds" and also as "an unnecessary but required evil . . . which does little harm but is of no particular use." To the contrary, data from DPS indicate that local Title I administrators see evaluation as highly necessary. Since the time that David collected her data, districts have had more of an opportunity to make use of evaluation after getting over the problems associated with implementation in the first years.

Targeting

Targeting is generally seen as falling at the midpoint of the burden dimension, yet it varies somewhat on the necessity dimension. Large districts rate targeting as more necessary than smaller districts do. These results are in line with general expectations since the smaller districts that serve few schools

devote much less time to targeting than districts with larger numbers of schools.

Complaint Resolution

Complaint resolution varies on both the necessity and burden dimensions as a function of district size. Smaller districts rate complaint resolution as more necessary and more burdensome than larger districts do. Despite these differences, complaint resolution is perceived as the leas' necessary and least burdensome requirement.

FACTORS ASSOCIATED WITH BURDEN AND NECESSITY

In an earlier section an examination of the parent involvement requirement suggests that ratings of burden are not necessarily a function of time spent on a particular requirement since parent involvement was rated as among the most burdensome requirements even though only 10 percent of the average Director's time was spent on that requirement. An examination of the burden ratings and their relationship to the overall amount of time spent on the administration of Title I indicates that except for the burden associated with comparability, burden is not a function of time spent on administration. The ratings of burden associated with comparability are highly related to the amount of time spent administering Title I, e.g., smaller districts' Directors who spend less time administering the program rate comparability as less burdensome than Directors in larger districts who spend more time administering the program and rate comparability as more burdensome.

In an effort to more closely examine the relationship between time spent on a particular requirement and ratings of necessity and burden for that requirement, time spent on evaluation and parent involvement is compared to Title I Directors' ratings of burden and necessity. Tables 4 and 5 present the results of this analysis, which indicate that the greater percentage of time spent on parental involvement and evaluation the more likely it is that these requirements will be rated as more necessary. For example, Directors who spend no time on parent involvement rate the necessity of parent involvement as 6.4 on a 10-point scale compared to those Directors who spend at least 16 percent of their time on parent involvement and rate it as 5.0 on the same scale.

Time spent on parental involvement does not show any statistical positive relationship to ratings of burden, while for evaluation there seems to be a relationship showing that the more time spent on evaluation the more likely it is to be perceived as burdensome. The results on the relationship between time spent on parent involvement and the ratings of burden reinforce earlier conclusions that the burden associated with parental involvement is more psychological and likely to be a function of frustration, unmet expectations, and bureaucratic requirements with few visible consequences.

IMPACTS OF ECIA

The final research question addressed is, "What are the likely impacts of ECIA on paperwork and administrative burden?"

TABLE 4

RELATIONSHIP BETWEEN TIME SPENT ON PARENT INVOLVEMENT AND RATINGS OF PARENTAL INVOLVEMENT REQUIREMENTS

Percentage of Total Time Spent Administering Title I Spent on Parent Involvement	Mean Ratings of Parental Requirements*			
	Necessity	n	Burden	n
0%	6.4**	104	4.3	100
1-5%	5.9	538	4.0	520
6-10%	5.4	490	3.7	471
11-15%	5.0	190	3.6	182
16% or more	5.0	262	3.8	256
Total	5.5	1,565	3.8	1,530

*A rating of 1 represents the most necessary or burdensome requirement and a rating of 10 represents the least necessary or burdensome requirement.

**An F ratio was statistically significant at $p < .01$.

TABLE 5

RELATIONSHIP BETWEEN TIME SPENT ON EVALUATION AND RATINGS OF THE EVALUATION REQUIREMENT

Percentage of Total Time Spent Administering Title I Spent on Evaluation	Mean Ratings of Parental Requirements			
	Necessity	n	Burden	n
0%	3.6**	112	4.7**	94
1-5%	3.8	305	4.7	283
6-10%	3.6	500	4.2	463
11-15%	3.5	252	4.1	243
16% or more	3.1	442	3.8	424
Total	3.5	1,611	4.2	1,507

*A rating of 1 represents the most necessary or burdensome requirement and a rating of 10 represents the least necessary or burdensome requirement.

**An F ratio was statistically significant at $p < .01$.

Other special reports in this series focus on ECIA and its impacts in the areas of evaluation, targeting, and student selection. The two activities rated as most burdensome and least necessary by Title I Directors--parent involvement and comparability--are significantly altered by ECIA and have, on the face, been made less burdensome.

Under §556(b)(3) of Chapter 1, LEAs must consult with teachers and parents as they design and implement their Chapter 1 projects. However, LEAs are not required to use PACs to meet the parent consultation requirement, nor are LEAs required to meet the other PAC requirement if the PAC is maintained.

Concerning comparability, Chapter 1 does not require that LEAs file comparability reports if the LEA has filed a written assurance with the SEA that it has established:

- A districtwide salary schedule
- A policy to ensure equivalence among schools in teachers, administrators, and auxiliary personnel
- A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies

When Title I Directors who answered the mail questionnaire were asked their opinions on ECIA, only 14 percent report they knew of ECIA and could make an assessment of its strengths and weaknesses. Out of a sample of approximately 200 district Directors, 19 percent of the respondents indicate that the best feature of ECIA is that it eliminates parent involvement requirements of P.L. 93-380. Eighteen percent think ECIA's strength is

the reduction of paperwork, and 14 percent feel it will permit more local control.

At the same time, 14 percent of the Directors answering this question feel that the relaxing of requirements for parent involvement is among the worst features of ECIA. Five percent of the respondents indicate that although Federal regulations and requirements might decrease because of ECIA, state controls and burden might increase.

SUMMARY

The preceding discussion examines how requirements for the Title I program are perceived by administrators of Title I at the local level. A previous review by the CCSSO indicated that administrative requirements of Title I were burdensome and needed modification. Ratings of Title I Directors in the mail survey indicate that parent involvement, evaluation, comparability, and student selection are considered to be burdensome program requirements. Yet two of these--evaluation and student selection--are also thought to be highly necessary for the program.

An examination of comparability, targeting, and complaint resolution reveals that ratings of burden are heavily influenced by the district's measure of size. For example, comparability is rated extremely burdensome by large districts but more neutral on the burden dimension by smaller districts. In the area of evaluation, ratings of the burden perceived by Title I Directors are directly related to the amount of time they spend on evaluation.

However, this is not true with respect to the parental involvement requirement suggesting that the burden rating associated with parental involvement may be more a function of psychological factors such as frustration with unmet expectations than the amount of time spent. In making decisions about reduction of administrative requirements, policymakers must not only consider the burden associated with a particular requirement, but they must weigh the importance of that requirement and how perceptions of burden may vary depending on district characteristics.

Although districts are hopeful that ECIA will reduce paperwork and relax certain requirements, there is concern that as the state role in Chapter 1 administration increases, state-related paperwork may also increase.

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APPENDIX A

07- 12 13
10 12 13

LOCAL ADMINISTRATION

40. In 1980-81 what percent of your time was spent administering Title I? (Circle the number that applies.)

1 0-25%
2 26-50%
3 51-75%
4 76-100%

18

41. Of the total time you spent administering Title I in 1980-81, estimate the percentage of time you spent on each of the following tasks. (Please make sure your response does not exceed 100%.)

☐☐ 17 PREPARING TITLE I APPLICATIONS AND REPORTS

☐☐ 19 DEVELOPING AND MANAGING THE TITLE I BUDGET

☐☐ 21 MANAGING AND SUPERVISING THE TITLE I INSTRUCTIONAL PROGRAM

☐☐ 23 HIRING STAFF AND ARRANGING TRAINING

☐☐ 25 ORGANIZING AND MEETING WITH PARENT GROUPS

☐☐ 27 DEALING WITH FEDERAL AND STATE OFFICIALS

☐☐ 29 EVALUATION

☐☐ 31 OTHER. PLEASE SPECIFY: _____

_____

☐ 33

1 1
12 13

43. Listed below are 10 categories of requirements in the existing Title 1 law and regulations. Based on your experience, which of these requirements are the most necessary for attaining the objectives of the program? The least necessary? According to your best estimates, which of these requirements are the most burdensome or require the most paperwork?

	IN THIS COLUMN, RANK THESE PROVISIONS FROM 1 TO 10. "1" THE MOST NECESSARY REQUIREMENT; "2" NEXT MOST NECESSARY, ETC.	IN THIS COLUMN, RANK THESE PROVISIONS FROM 1 TO 10. "1" MOST BURDENSOME; "2" NEXT MOST BURDENSOME, ETC.	
RANKING AND SELECTING PROJECT AREAS	☐☐	☐☐	14-17
RANKING AND SELECTING STUDENTS	☐☐	☐☐	18-21
PARENT INVOLVEMENT, INCLUDING ADVISORY COUNCILS	☐☐	☐☐	22-25
COMPLAINT RESOLUTION PROCEDURES	☐☐	☐☐	26-29
EVALUATION PROCEDURES	☐☐	☐☐	30-33
SUPPLEMENT-NOT-SUPPLANT PROVISIONS	☐☐	☐☐	34-37
MAINTENANCE OF EFFORT PROVISIONS	☐☐	☐☐	38-41
COMPARABILITY PROCEDURES	☐☐	☐☐	42-45
EXCESS COST DETERMINATIONS	☐☐	☐☐	46-49
ADEQUATE SIZE, SCOPE, AND QUALITY PROVISIONS	☐☐	☐☐	50-53

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